

**IN UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

AMANDA LABRIER, on behalf of herself)	
and on behalf of all others similarly situated,)	
)	
)	
Plaintiff,)	
)	
v.)	Case No. 15-04093-NKL
)	
STATE FARM FIRE AND CASUALTY)	
COMPANY,)	
)	
Defendant.)	

**EXHIBIT M
AFFIDAVIT OF T. JOSEPH SNODGRASS IN SUPPORT OF
PLAINTIFF'S MOTION FOR RULE 23 CLASS CERTIFICATION**

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION

AMANDA LA BRIER,)	
on behalf of herself and)	
all others similarly situated,)	
)	
Plaintiff,)	
)	
v.)	Case No. 15-04093-NKL
)	
STATE FARM FIRE)	
AND CASUALTY COMPANY,)	
)	
Defendant.)	

DECLARATION OF JOE D. JACOBSON

Joe D. Jacobson, hereby declares, under penalty of perjury as provided by 28 U.S.C. § 1746, the following in support of plaintiff's motion for class certification:

1. I graduated in 1986 from the Boston University School of Law with a Juris Doctor degree, magna cum laude. I was admitted to the Bar of the State of Missouri in 1986, the Bar of the State of Illinois in 1987, and the Bar of the District of Columbia in 1988. I am also admitted to practice before the following federal courts: the United States Supreme Court; the Courts of Appeals for the Federal, Second, Third, Seventh, and Eighth Circuits; the District Courts for Eastern and Western Districts of Missouri and the Southern and Central Districts of Illinois; and the Court of Federal Claims. I am in good standing with each of these bars and have never had my license disciplined by any bar or court.

2. In my almost 30 years as a lawyer, I have tried more than 65 cases to a verdict or judgment in front of a jury or judge. I have served as the primary attorney in over 90 appeals.

3. I am fully aware of the duties and obligations of class counsel under Rule 23 and other, applicable law, and I take these duties seriously.

4. I have tried and handled the appeals in a number of class actions across the United States. I was one of the primary lawyers representing two of the plaintiff classes in *In re BankAmerica Corp. Securities Litigation*, MDL No. 1264 (E.D. Mo.). This case settled shortly before trial for a total settlement fund of \$490 million. The case gave rise to several appeals, including *In re BankAmerica Corp Securities Litigation*, 263 F.3d 795 (8th Cir. 2001), which established a new exception to the federal Anti-Injunction Act in the context of securities class actions, and *In re BankAmerica Corp Securities Litigation*, 350 F.3d 747 (8th Cir. 2003), which established that the Private Securities Litigation Reform Act (the “PSLRA”) did not give dissident lead plaintiffs a veto power over a class action settlement.

5. Class action cases in which I participated as trial counsel that were tried to a verdict or judgment include *Brady v. Air Line Pilots Ass’n, Int’l*, Civil Action No. 02-2917 (JEI) (the “TWA Pilots case”); *Carpenter v. Countrywide Home Loans, Inc.*, 250 S.W.3d 697 (Mo. banc 2008); and *Eisel v. Midwest BankCentre*, 230 S.W.3d 335 (Mo. banc 2007).

6. The TWA Pilots case is notable. I second-chaired the liability trial behind my law partner, Allen Press. This 5-1/2 week jury trial led to a verdict of liability and

causation. The case ultimately settled for \$53 million a few months before trial was set for the determination of damages. The settlement was affirmed over objection in *Brady v. Air Line Pilots Ass'n*, 627 Fed. Appx. 142, 2015 U.S. App. LEXIS 16867 (3rd Cir.) (unpublished).

7. I am co-class counsel in a class action case presently on appeal, *Anheuser-Busch Companies, LLC vs. Knowlton*, Appeals Nos. 15-3538, 15-3851 (8th Cir.). This is an ERISA case on behalf of a class of salaried employees of a former wholly-owned subsidiary of Anheuser-Busch Companies (“ABC”) who were denied a pension enhancement provided by the Plan for termination of their employment with the ABC-controlled group of companies within three years following a change in control of ABC. The United States District Court for the Eastern District of Missouri certified the class and found in favor of the class on the issue of liability. The defendants have appealed. We have a cross-appeal on a damages issue.

8. I am co-counsel in a number of putative class actions, not yet certified as class actions, raising the issue of the depreciation of labor in the calculation of actual cash value payments on structural loss claims in Missouri. These other cases raises issue identical or substantially similar to the issues raised in this case.

9. I was a founding shareholder of Green Jacobson, P.C., a leading complex litigation law firm operating in St. Louis from 1995 through 2014. I am a founding shareholder of Jacobson Press & Fields, P.C., a law firm that opened its practice in January 2015.

10. I have served as the General Counsel of the Housing Authority of St. Louis County, Missouri since 1998.

11. I was nominated for a seat on the Missouri Supreme Court by the Missouri Appellate Judicial Commission in September 2011. This was a merits-based nomination under the Missouri non-partisan court plan.

I state under penalty of perjury that the foregoing is true and correct. Executed on April 5, 2016.


